

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**JOINT STIPULATION TO EXTEND TIME FOR DEFENDANTS ROCKY  
MOUNTAIN DATA ANALYTICS LLC AND THOMAS MULCAIRE TO ANSWER  
OR OTHERWISE RESPOND TO THE CONSOLIDATED CLASS ACTION  
COMPLAINT**

Plaintiffs and Defendants Rocky Mountain Data Analytics LLC and Thomas Mulcaire, by and through their respective undersigned counsel agree and stipulate as follows:

**WHEREAS**, on March 24, 2021, the Court ordered Defendants Clearview AI, Inc., Hoan Ton-That, and Richard Schwartz to answer or otherwise respond to Plaintiffs', then-forthcoming, consolidated class action complaint by May 24, 2021, ECF No. 28 (the "March 24, 2021 Order");

**WHEREAS**, on April 9, 2021, Plaintiffs filed a Consolidated Class Action Complaint (the “Complaint”), adding Rocky Mountain Data Analytics LLC and Thomas Mulcaire as Defendants:

**WHEREAS**, on April 19, 2021, the Summons and Complaint was served upon Defendant Rocky Mountain Data Analytics LLC;

**WHEREAS**, on May 6, 2021, the undersigned counsel for Defendant Thomas Mulcaire agreed to accept service of the Summons and Complaint on Thomas Mulcaire's behalf—subject to a reservation of rights as to all defenses (except as to adequacy of service), including but not limited to personal jurisdiction and venue.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned  
counsel that Defendants Rocky Mountain Data Analytics LLC and Thomas Mulcaire shall

answer or otherwise respond to the Complaint by May 24, 2021, in accordance with the briefing schedule set forth in the March 24, 2021 Order. Defendants Rocky Mountain Data Analytics LLC and Thomas Mulcaire have not made any previous requests for adjournments or extensions. Defendants reserve the right to raise any applicable defenses, except adequacy of service.

Dated: May 7, 2021

/s/ Scott R. Drury

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*Attorneys for Defendants Clearview AI, Inc.,  
Hoan Ton-That, Richard Schwartz, Rocky  
Mountain Data Analytics LLC, and Thomas  
Mulcaire*

**SO ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2021

**CERTIFICATE OF SERVICE**

I certify that on May 7, 2021 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a Notice of Electronic Filing to all counsel of record.

By: /s/ Floyd Abrams  
Floyd Abrams